

DAVIS WRIGHT TREMAINE LLP

JEFF SILVESTRI
Nevada Bar No. 5779
McDONALD CARANO WILSON LLP
2300 W. Sahara Avenue, Suite 1200
Las Vegas, NV 89102
Telephone: (702) 873-4100
Fax: (702) 873-9966
E-mail: jsilvestri@mcdonaldcarano.com

KENNETH E. PAYSON (*admitted pro hac vice*)
Washington Bar No. 26369
JAMES HARLAN CORNING (*admitted pro hac vice*)
Washington Bar No. 45177
DAVIS WRIGHT TREMAINE LLP
920 Fifth Avenue, Suite 3300
Seattle, Washington 98104-1610
Telephone: (206) 622-3150
Facsimile: (206) 757-7700
Email: kennethpayson@dwt.com
jamescorning@dwt.com

Attorneys for the Saxe Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JEREMY BAUMAN, et al.,

Plaintiffs,

vs.

DAVID SAXE; et al.,

Defendants.

Case No. 2:14-cv-01125-RFB-BNW

**SECOND UNOPPOSED MOTION TO
CONTINUE STAY**

BIJAN RAZILOU, et al.,

Plaintiffs,

vs.

DAVID SAXE; et al.,

Defendants.

In consolidation with
Case No.: 2:14-cv-01160-RFB-BNW

UNOPPOSED MOTION

The Saxe Defendants¹ and Plaintiffs Jeremy Bauman and Bijan Razilou jointly move the Court to enter the following Order continuing the staying this case for a period of 14 additional days while they execute a written settlement agreement memorializing the settlement reached at the mediation on May 15, 2019, and to allow Plaintiffs to file their motion for preliminary approval of the class-wide settlement. The Saxe Defendants and Plaintiffs are informed and understand that Twilio does not oppose this motion. In support of their request, the Saxe Defendants and Plaintiffs represent the following:

1. On May 15, 2019, the Saxe Defendants and Plaintiffs participated in a mediation on May 15, 2019, and reached an agreement in principle to resolve this case on a class-wide basis.

2. On July 24, 2019, the Saxe Defendants and Plaintiffs filed an Unopposed Motion to Continue Stay, asking the Court to stay this matter until August 23, 2019, and to suspend all case-related deadlines and activities, to allow the parties time to finalize their written settlement and to prepare and file a motion for preliminary approval of that settlement.

3. The parties negotiated, exchanged numerous drafts of, and ultimately finalized a written settlement agreement, pursuant to which Plaintiffs intend to present the Court with a motion for preliminary approval of a class-wide settlement of this case. However, due to client and counsel travel, the parties need a brief additional continuance to obtain signatures and to prepare and file the motion for preliminary approval. The parties anticipate this process will be complete by no later than September 6, 2019.

4. In the interest of avoiding expense to the parties and conserving the Court's resources, the Saxe Defendants and Plaintiffs jointly request that the Court continue the stay in this matter for an additional 14 days, to September 6, 2019. To that end, the Saxe Defendants and Plaintiffs request that the Court enter the accompanying Order.

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¹ The Saxe Defendants are V Theater Group, LLC; Saxe Theater, LLC; David Saxe Productions, Inc.; David Saxe Productions, LLC; Saxe Management, LLC, and David Saxe.

1 Stipulated to and respectfully submitted this 22nd day of August 2019, by:

2
3 /s/ Matthew R. Mendelsohn

4 Matthew R. Mendelsohn

5 New Jersey Bar No. 015582005

6 Admitted *Pro Hac Vice*

7 MAZIE SLATER KATZ & FREEMAN, LLC

8 103 Eisenhower Parkway

9 Roseland, New Jersey 07068

10 Payam Shahian

11 California Bar No. 228406

12 Admitted *Pro Hac Vice*

13 STRATEGIC LEGAL PRACTICES, APC

14 1875 Century Park East, Suite 700

15 Los Angeles, California 90067

16 Dennis L. Kennedy

17 Nevada Bar No. 14625

18 Paul C. Williams

19 Nevada Bar No. 12524

20 BAILEY KENNEDY

21 8984 Spanish Ridge Avenue

22 Las Vegas, Nevada 89148

23 *Attorneys for Plaintiff Bijan Razilou*

24 Albert H. Kirby

25 Washington Bar No. 40187

26 Admitted *Pro Hac Vice*

27 SOUND JUSTICE LAW GROUP, PLLC

28 936 North 34th Street, Suite 300

Seattle, Washington 98103

Philip S. Aurbach

Nevada Bar No. 1501

Michael David Maupin

Nevada Bar No. 13721

MARQUIS AURBACH COFFING

10001 Park Run Drive

Las Vegas, Nevada 89145

Attorneys for Plaintiff Jeremy Bauman

/s/ James Harlan Corning

Kenneth E. Payson

Washington Bar No. 26369

Admitted *Pro Hac Vice*

James Harlan Corning

Washington Bar No. 45177

Admitted *Pro Hac Vice*

DAVIS WRIGHT TREMAINE LLP

920 Fifth Avenue, Suite 3300

Seattle, WA 98104-1610

Jeff Silvestri

Nevada Bar No. 5779

McDONALD CARANO

2300 W. Sahara Avenue, Suite 1200

Las Vegas, NV 89102

Attorneys for the Saxe Defendants

DAVIS WRIGHT TREMAINE LLP

920 Fifth Avenue, Suite 3300

Seattle, Washington 98104-1610

(206) 622-3150 FAX: (206) 757-7700

ORDER

Having considered the Saxe Defendants' and Plaintiffs' Second Unopposed Motion to Continue Stay, and good cause appearing therefore, the Court hereby GRANTS the Unopposed Motion. This case shall remain STAYED until September 6, 2019. By no later than that date, either a motion for preliminary approval of settlement shall be filed or a Joint Status Report shall be submitted to the Court proposing how this matter will proceed.

IT IS SO ORDERED.

DATED: September 6,, 2019



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DAVIS WRIGHT TREMAINE LLP

920 Fifth Avenue, Suite 3300
Seattle, Washington 98104-1610
(206) 622-3150 FAX: (206) 757-7700

CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2019, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notifications of such filing to all counsel of record as of the time of the filing.

/s/ James Harlan Corning
James Harlan Corning

DAVIS WRIGHT TREMAINE LLP

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Seattle, Washington 98104-1610
(206) 622-3150 FAX: (206) 757-7700